

### **REMARKS**

Claims 1-9, as amended, are pending in this application. In this Response, Applicants have amended independent claim 1 to clarify features of the present invention. In light of the Office Action, Applicants believe these amendments serve a useful clarification purpose, and are desirable for clarification purposes, independent of patentability. Accordingly, Applicants respectfully submit that the claim amendments do not limit the range of any permissible equivalents. As no new matter has been added by the amendments herein, Applicants respectfully request entry of these amendments at this time.

### **THE OBJECTIONS TO THE CLAIMS**

Claims 2-7 were objected to for the reasons set forth on page 3 because they recite “A computer implemented method” instead of “The computer implemented method.” As shown above, Applicants have amended claims 2-7 in the manner suggested by the Examiner. As such, Applicants submit that the Examiner’s objections to the claims have been overcome. Reconsideration and withdrawal of the objection is respectfully requested.

### **THE REJECTIONS UNDER 35 U.S.C. § 112(1)**

At page 4 of the Office Action the Examiner rejected claims 1-9 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. While Applicants disagree with the Examiner’s contentions, the rejected features have been cancelled from the claims for reasons unrelated to patentability. As such, Applicants submit that the Examiner’s § 112 rejection is moot. Reconsideration and withdrawal of the rejection is respectfully requested.

### **THE REJECTIONS UNDER 35 U.S.C. § 112(2)**

Claims 1-9 were rejected under 35 U.S.C. § 112, second paragraph, for the reasons set forth on page 4 of the Office Action. Specifically, the Examiner stated that the claims were indefinite. As shown above, however, Applicants have amended claim 1 to remove the features objected to by the Examiner. Thus, while disagreeing with the Examiner’s objections, Applicants submit that the § 112(2) rejections are moot. Reconsideration and withdrawal of the rejection is respectfully requested.

### **THE REJECTIONS UNDER 35 U.S.C. § 102**

Claims 1-9 were rejected under 35 U.S.C. § 102(e) as being anticipated by Levine for the reasons set forth on pages 5-9 of the Office Action. As discussed below, Applicants submit that the Examiner's rejections have been overcome.

For the sake of brevity, Applicant's discussion of Levine discussed in the previous Response filed December 27, 2007 is incorporated herein and elaborated upon as follows. Among the features disclosed by Levine is an automatic sequencing algorithm. Col. 13, lines 23-24. The algorithm maintains two lists of join objects. Col. 13, lines 24-25. The first list is the input "raw" list, which reflects the order in which the tables were selected. Col. 13, lines 25-27. The second list is the final "ordered" list that produces valid SQL syntax. Col. 13, lines 29-32. Tables are moved from the "ordered" list and deleted from the "raw" list. *Id.* Thus, the Examiner's contention that Levine discloses only one list is directly contradicted by the explicit description provided by Levine. Office Action at Page 3.

As a first step, a table is moved from the "raw" list to the "ordered" list, and the table is deleted from the "raw" list. Col. 13, lines 43-46. Then, Levine determines if the table moved from the "raw" list to the "ordered" list has any related tables. Col. 13, lines 51-53. If there is a related table in the "raw" list, that related table is added to the "ordered" list and deleted from the "raw" list. Col. 13, lines 51-59. This step is repeated until all of the tables have been moved from the "raw" list to the "ordered" list. Col. 14, lines 5-9. In this manner, the tables from the "raw" list may be ordered properly so that each successive table in the join has a relationship with a table that has already been specified. Col. 13, lines 1-4.

It is important to note that Levine discloses moving a table from a "raw" list to an "ordered" list. In other words, the tables from the "raw" list are all reordered in the "ordered" list. The reordering is based on comparing a table moved to the "ordered" list with the related tables list. If the related tables list shows that a related table is remaining in the "raw" list, it is moved to the "ordered" list, thereby generating a correct sequence listing of the tables. Thus, logic dictates that tables listed in the related tables list will be joined.

An example is helpful to clarify this matter. Consider the "raw" table and "related table" below.

<b>Raw Table</b>
A
B
A1

<b>Related Tables</b>	
A	A1

In this example, tables A and A1 are related. Thus, according to the description of Levine above, the tables will be reordered. First, table A will be moved to the “ordered” list and deleted from the “raw” list. Then, the “Related Tables” list will be referenced to determine if any tables are related. In this example, tables A and A1 are related. Thus, table A1 will be moved from the “raw” table to the “ordered” table, and deleted from the “raw” table. Because there are no more tables related to table A, table B will be moved to the “ordered” list. Since table B does not have any related tables, the process described by Levine ends. The final “ordered” table is shown below.

<b>Ordered Table</b>
A
A1
B

The example shown above clarifies the operation discussed by Levine. However, those skilled in the art will note that the related table serves merely as a reference table. That is, it is not changed, *i.e.*, it still lists tables A and A1 as being related. Indeed, Levine does not teach or suggest deleting any tables from the reference table. Instead, tables are deleted from the “raw” table and moved to the “ordered” list. Further, it is clear that the tables listed in the “Related Tables,” *i.e.*, table A and A1, are still joined in the “ordered” list.

Levine, therefore, contrasts with claim 1 of the present invention, which recites that a list of tables that are related to returning a set of results but that are not directly referred to by the SQL statement is prepared. Any joins remaining on the list are then prevented from being joined. This feature, *i.e.*, preventing joins remaining in a related tables list, is not taught by

Levine. Instead, the table of related tables serves merely as a reference table, and tables listed in the table are not prevented from being joined, as explained above.


Thus, Levine does not teach each and every feature of the present invention recited by amended independent claim 1. As such, reconsideration and allowance of the pending claims is respectfully requested.

### **CONCLUSION**

All claims are believed to be in condition for allowance. If the Examiner believes that the present amendments and remarks still do not resolve all of the issues regarding patentability of the pending claims, Applicants invite the Examiner to contact the undersigned attorneys to discuss any remaining issues. No fees are believed to be due at this time. Should any fee be required, however, please charge such fees to Deposit Account No. 50-4545, Order No. 5231-096-US01.

Respectfully submitted,  
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